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August 19, 2010

VIA OVERNIGHT DELIVERY

Mr. Charles Terreni
Chief Clerk of the Commission
South Carolina Public Service Commission
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210
(803) 896-5100

Re: Safari Communications, Inc.
Docket No. 2010-247-C

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Dear Mr. Terreni:

Pursuant to letter dated August 19, 2010 in the above-referenced docket, enclosed please find for filing an original and twenty-five (25) copies of the company's pre-filed testimony.

I have enclosed an extra copy of this letter to be date-stamped and returned to me in the self-addressed, postage prepaid envelope I have provided.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me.

Respectfully submitted,


Lance J.M. Steinhart
Attorney Safari Communications, Inc.

cc:

Lessie Hammonds – ORS via e-mail: lhammon@regstaff.sc.gov

Scott Elliott via e-mail: selliott@elliottlaw.us

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BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2010-247-C ²⁷⁴

IN RE: APPLICATION OF)
SAFARI COMMUNIATIONS, INC.)
FOR CERTIFICATION AS AN ELIGIBLE) DIRECT TESTIMONY
TELECOMMUNICATIONS CARRIER) OF Thomas Peltier
)

I. Introduction

- 1 **Q: PLEASE STATE YOUR NAME, YOUR POSITION WITH SAFARI**
2 **COMMUNIATIONS, INC. AND YOUR BUSINESS ADDRESS.**
- 3 **A:** My name is Thomas Peltier. My title is President of Safari Communications, Inc.
4 (hereinafter sometimes referred to as “Safari”). My business address is 4915
5 Dorothy Avenue, Sarasota, Florida 34235.
- 6 **Q: PLEASE PROVIDE A BRIEF DESCRIPTION OF YOUR BACKGROUND**
7 **AND EXPERIENCE.**
- 8 **A:** My background and experience is attached hereto as Exhibit A.

1

2 **Q: WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

3 **A:** The purpose of my testimony is to demonstrate that Safari meets the state and
4 federal requirements for designation as an Eligible Telecommunications Carrier
5 (“ETC”) in the State of South Carolina in the designated areas of BellSouth
6 Telecommunications/AT&T South Carolina service territory (the “Designated
7 Service Area”). A List of Wire Centers is attached as Exhibit 1 to our application
8 filed in this Docket.

9 **Q: DOES SAFARI CURRENTLY PROVIDE TELECOMMUNICATIONS**
10 **SERVICE IN SOUTH CAROLINA?**

11 **A:** Yes. Safari was granted a Certificate of Public Convenience and Necessity to
12 Provide Competitive Resold Local Exchange Telecommunications Services
13 within the State of South Carolina Pursuant to Order No. 2010-477 issued in
14 Docket No. 2010-104-C on July 15, 2010. Safari is also a common carrier as that
15 term is defined in 47 U.S.C. §153(10), and Safari meets the requirements of 47
16 U.S.C. § 214(e)(1).

17 **Q: DOES SAFARI CURRENTLY CONTRIBUTE TO THE FUNDING FOR**
18 **UNIVERSAL SERVICE?**

19 **A:** Yes. Federal regulations require carriers such as Safari to contribute a portion of
20 their revenues to the funding of federal universal service.

1
2 **Q: IS THE COMPANY PRESENTLY ABLE TO DRAW FROM FEDERAL**
3 **UNIVERSAL SERVICE FUNDS FOR THE PROVISION OF THE**
4 **SUPPORTED SERVICES IN SOUTH CAROLINA?**

5 **A:** No. Until it is designated as an ETC for those areas it serves in South Carolina,
6 Safari is not able to receive any federal universal service funds to support its
7 provision of universal services to South Carolina consumers.

8 **Q: BY OBTAINING ETC DESIGNATION, WILL SAFARI IMPROVE THE**
9 **QUALITY OF BASIC SERVICE PROVIDED TO SOUTH CAROLINA**
10 **RESIDENTS?**

11 **A:** Yes. As required, if Safari receives ETC designation, any universal service
12 funding it receives will be used only to support the provision, upgrading and
13 maintenance of Safari's residential network where Safari is designated as an ETC
14 in South Carolina. As a result, Safari will be able to improve the quality of basic
15 service by increasing the availability of this unique service to customers who
16 reside in areas of the state where the service is currently unavailable and, due to
17 credit and deposit requirements, may not be able to obtain the safety and
18 convenience of telephone service from traditional providers.

19
20 **Q: WILL SAFARI'S CUSTOMERS EXPERIENCE OTHER BENEFITS AS A**
21 **RESULT OF SAFARI'S DESIGNATION AS AN ETC?**

22 **A:** Yes. Since Safari is seeking only low income support, and Lifeline is designed to
23 reduce the monthly cost of telecommunications services for eligible consumers,

1 and is distributed on a per-customer basis and is directly reflected in the price that
2 the eligible customer pays, it is assured that all support received by the carrier is
3 used to provide Lifeline services to consumers, thus promoting Lifeline and the
4 availability of telephone service to low income users, which is clearly in the
5 public interest.

6 **Q: IS A COMPETITIVE LOCAL EXCHANGE CARRIER LIKE SAFARI**
7 **ELIGIBLE FOR FEDERAL UNIVERSAL SERVICE SUPPORT?**

8 **A:** Yes. Both the 1996 Telecommunications Act ("TA'96") and the FCC's rules
9 establish the directives for the Commission to follow in making an ETC
10 designation. Section 214(e) of TA'96 specifically provides that any common
11 carrier, including a competitive local exchange carrier such as Safari, may be
12 designated as an ETC for federal universal service support purposes, provided
13 that carrier meets the specific criteria set forth in Section 214(e)(1) of the Act,
14 which Safari does.

15 **Q: WHAT ARE THE REQUIREMENTS FOR OBTAINING ETC**
16 **DESIGNATION?**

17 **A:** The eligibility requirements were recently supplemented by the FCC. The initial
18 requirements established by §214(e)(1) of the Act are still in place, and state:
19 A common carrier designated as an eligible telecommunications carrier under
20 paragraph (2) or (3) shall be eligible to receive universal service support in
21 accordance with section 254 and shall, throughout the service area for which the
22 designation is received:

1
2 (A) Offer the services that are supported by Federal universal service support
3 mechanisms under Section 254(c), either using its own facilities or a combination
4 of its own facilities and resale of another carrier's services (including the services
5 offered by another eligible telecommunications carrier); and
6

7 (B) Advertise the availability of such services and the charges therefore using
8 media of general distribution.
9

10 **Q: IS SAFARI REQUESTING DESIGNATION IN THIS PROCEEDING FOR**
11 **THE STUDY AREA OF ANY RURAL LEC IN SOUTH CAROLINA?**

12 **A:** No. Safari's Petition requests designation only in the wire centers of
13 BellSouth/AT&T which have been classified as non-rural.

14 **Q: DOES SAFARI CURRENTLY HAVE INTERCONNECTION**
15 **AGREEMENT WITH BELLSOUTH/AT&T?**

16 **A:** Yes.

17 **Q: IS IT YOUR UNDERSTANDING THAT SAFARI IS ENTITLED TO BE**
18 **DESIGNATED AS AN ETC IF IT DEMONSTRATES THAT IT IS**
19 **CAPABLE OF MEETING ALL OF THE OBLIGATIONS IMPOSED BY**
20 **SECTION 214(e) OF TA'96 AS WELL AS THE NEW REQUIREMENTS**
21 **ESTABLISHED BY THE FCC'S MARCH, 2005 ORDER?**

22 **A:** Yes. Safari has filed an Affidavit in support of its requirements for designation as
23 an Eligible Telecommunications Carrier as Exhibit 4 to our application filed in
24 this Docket.

1 **Q: THE FIRST CRITERION FOR ETC DESIGNATION UNDER SECTION**
2 **214(e)(1) IS COMMON CARRIER STATUS. IS SAFARI A COMMON**
3 **CARRIER?**

4 **A:** Yes. Safari is a "common carrier" for purposes of obtaining ETC designation
5 under 47 U.S.C. § 214(e)(1). A common carrier is generally defined in 47 U.S.C.
6 §153(10) as "any person engaged as a common carrier for-hire" in interstate or
7 foreign communications utilizing either wire or radio technology, except for radio
8 broadcasters.

9 **Q: THE SECOND REQUIREMENT IS THAT SAFARI OFFER THE**
10 **"SUPPORTED SERVICES." WHAT ARE THE SUPPORTED SERVICES**
11 **THAT MUST BE OFFERED?**

12 **A:** The FCC has identified (at 47 C.F.R. §54.101(a)) the following services and
13 functionalities as the core services to be offered by an ETC and supported by
14 federal universal service support mechanisms:

- 15 1. voice-grade access to the public switched network;
- 16 2. local usage;
- 17 3. dual tone multi-frequency signaling or its functional equivalent;
- 18 4. single-party service or its functional equivalent;
- 19 5. access to emergency services;
- 20 6. access to operator services;
- 21 7. access to interexchange services;
- 22 8. access to directory assistance;
- 23 9. toll limitation for qualifying low-income consumers

1 **Q: CAN SAFARI CURRENTLY PROVIDE THE SUPPORTED SERVICES**
2 **SET FORTH ABOVE USING ITS NETWORK THAT IS IN PLACE**
3 **TODAY?**

4 **A:** Yes. Safari's present network can provide all of the supported services to
5 consumers in South Carolina. Safari recognizes its obligation to offer these
6 services including the "toll limitation for qualifying low-income consumers"
7 service that is linked to the federal "Lifeline" program and targeted at meeting the
8 needs of low-income consumers. Safari, however, cannot participate in the
9 federal Lifeline program until it receives its ETC designation. Once Safari
10 receives ETC designation it will provide toll limitation as required by the FCC's
11 rules.

12 **Q: COULD YOU EXPLAIN EACH OF THE SUPPORTED SERVICES AND**
13 **HOW SAFARI PROVIDES, OR WILL PROVIDE THESE SERVICES?**

14 **A:** Yes. Safari presently provides or plans to provide each of the supported services
15 identified by the FCC in 47 C.F.R. § 54.101(a) as follows:

- 16
- 17 a. *Voice-grade access to the public switched telephone network.* The
18 FCC has concluded that voice grade service means the ability to make and
19 receive phone calls, within a specified bandwidth and frequency range.
20 Safari meets this requirement by providing voice-grade access to the
21 public switched telephone network. Through its interconnection
22 agreements, all customers of Safari are able to make and receive calls on
23 the public switched telephone network within the specified bandwidth.

1 b. *Local usage.* ETCs must include local usage beyond providing
2 simple access to the public switched network as a part of a universal
3 service offering. Safari includes specified quantities of usage in its rate
4 plans and thereby complies with the requirement. It is important to note,
5 that currently, there is no specific rule that requires an ETC to include any
6 particular amount of local usage, although all of Safari's service offerings
7 include unlimited local calling.

8 c. *Dual-tone, multi-frequency ("DTMF") signaling or its functional*
9 *equivalent.* DTMF, more commonly known as touch-tone, is a method of
10 signaling that facilitates the transport of call set-up and detail information.
11 Through its interconnection agreements, Safari provides DTMF signaling
12 to its customers, which is the equivalent of that offered by the incumbent
13 LECs to its customers.

14 d. *Single-party service or its functional equivalent.* Safari meets the
15 requirement of single-party service by providing a dedicated message path
16 for the length of all customer calls.

1
2 e. *Access to emergency services.* The ability to reach a public
3 emergency service provider by dialing 911 is a requirement in any
4 universal service offering. Safari currently provides its subscribers access
5 to 911 emergency service in accord with this requirement, and consistent
6 with FCC Regulations throughout the service area for which designation
7 is sought. Safari also provides Enhanced 911 services including Phase I
8 and Phase II E911 services where requested by local public safety
9 authorities ready to receive the information and where the local exchange
10 carrier supports such services.

11 f. *Access to operator services.* Access to operator services is defined
12 as any automatic or live assistance provided to a consumer to arrange for
13 billing or completion, or both, of a telephone call. Safari currently
14 provides access to operator services through a 1-800 calling service.
15 Customers can also obtain 1+ service through a third party provider to
16 access such services.

17 g. *Access to directory assistance.* Much like operator services, Safari
18 currently offers access to directory assistance services through a 1-800
19 calling service. Customers can also obtain 1+ service through a third
20 party provider to access such services.

21 h. *Access to interexchange service.* Safari meets the requirements of
22 access to interexchange service by providing all of its customers with the
23 ability to make and receive interexchange calls through 1+800 calling

1 services provided by third party LD carriers. Additionally, customers can
2 obtain 1+ services through a third party provider, and are able to reach
3 their IXC of choice by dialing the appropriate access code.

4 i. *Toll limitation for qualifying low-income consumers.* As
5 previously mentioned, toll limitation for qualifying low-income
6 consumers is linked to participation in the Lifeline program, which Safari
7 will participate in and offer upon designation as an ETC. 47 CFR §
8 54.400(d) defines Toll Limitation” as either toll blocking *or* toll control
9 for telecommunications carriers that are incapable of providing both
10 services. At this time, Safari does offer toll control. Per the requirements
11 of 47 CFR § 54.400(d) Safari will provide eligible Lifeline subscribers
12 with the ability to subscribe to toll blocking, at no additional charge,
13 which restricts the dialing of toll billed calls while permitting local calls,
14 and non-chargeable calls to company numbers such as repair service,
15 emergency numbers (911) and 800 dialing.

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2 **Q: DOES SAFARI OFFER THE ABOVE-REFERENCED SUPPORTED**
3 **SERVICES VIA ITS OWN FACILITIES OR A COMBINATION OF ITS**
4 **OWN FACILITIES AND RESALE OF ANOTHER CARRIER'S**
5 **SERVICES?**

6 **A:** Depending on the type of service the customer requests and the precise location of
7 the customer, Safari offers the supported services either through the purchase of
8 switched port/loop combinations Unbundled Network Elements (UNEs) or
9 through resale of another carrier's services. Consistent with the requirements of
10 47 CFR. § 201(e), these facilities are physical components of the
11 telecommunications network that are used in the transmission or routing of the
12 services for which support is requested. Because these facilities include
13 unbundled network elements, they meet the FCC's definition of "own facilities"
14 established in 47 CFR § 201(f) and thereby make the method by which Safari
15 provisions the supported services consistent with the FCC's rules found at 47
16 CFR § 54.201(d)(1) through (i).

17 **Q: WILL SAFARI PROVIDE SUPPORTED UNIVERSAL SERVICES ONCE**
18 **DESIGNATED AS AN ETC?**

19 **A:** Yes. Safari will provide all supported universal services once designated as an
20 ETC.

Q: WILL SAFARI PARTICIPATE IN THE LIFELINE AND LINK-UP PROGRAMS IF IT IS DESIGNATED AS AN ETC?

A: Yes, as we stated in our Petition, upon designation as an ETC, Safari will participate in, and offer, LifeLine and Link-Up programs to qualifying low-income consumers and publicize the availability of Lifeline and Link-Up services in a manner reasonably designed to reach those likely to qualify for those services, as required by 47 C.F.R. §§ 54.401-54.417; 54.405(b)& 54.411(d).

Q: A THIRD REQUIREMENT FOR DESIGNATION AS AN ETC IS TO ADVERTISE THE AVAILABILITY OF THE SUPPORTED SERVICES. HOW DOES SAFARI INTEND TO ADVERTISE THE AVAILABILITY OF THE SUPPORTED SERVICES?

A: Safari advertises the availability of the supported services and the corresponding charges in a manner that informs the general public within the designated service area of both the services available and the corresponding charges. Safari advertises its services through several different media of general distribution including (but not limited to) marketing at targeted retail locations as well as advertisements via television, radio, newspapers and various free publications target at low-income consumers such as the “Dollar Saver”. In addition, Safari will comply with the requirements of 103-690(C) of the Commissions rules, which states that “carriers seeking certification in areas not eligible for High Cost Support from the USF, but seeking ETC designation for the purpose of participation in the Lifeline and Link Up programs...shall submit a two-year plan

1 that describe the methods and means for advertising and outreach programs for
2 identifying, qualifying, and enrolling eligible participants in the Lifeline and link
3 Up programs”.

4 **Q: IS SAFARI ABLE TO SATISFY EACH OF THE ADDITIONAL**
5 **REQUIREMENTS ESTABLISHED IN THE FCC’S MARCH 17, 2005**
6 **ORDER?**

7 **A:** Yes. Safari will provide each of the supported services identified in 47 C.F.R.
8 §54.101 as follows:

9 a. Safari will commit to provide service throughout its proposed designated
10 service area to all customers making a reasonable request for service. Safari
11 certifies that it will (a) provide service on a timely basis to requesting customers
12 within the applicant’s service area where the applicant’s network already passes
13 the potential customer’s premises; and (b) provide service within a reasonable
14 period of time, if the potential customer is within Safari’s licensed service area
15 but outside its existing network coverage, if service can be provided at reasonable
16 cost by reselling services from another carrier’s facilities to provide service.

17 b. Under FCC guidelines, an ETC Applicant must submit a five-year plan
18 that describes with specificity proposed improvements or upgrades to the
19 applicant’s network on a wire center-by-wire center basis throughout its proposed
20 Designated Service Area. The only circumstance warranting deviation from this
21 requirement is where an applicant’s requested ETC serving territory would qualify
22 it to receive no “high cost” USF support, but only “low income” USF support.
23 Because Safari seeks ETC designation solely for purposes of reimbursement for

1 provision of subsidized Lifeline and Link-Up services to eligible customers,
2 submission of a Five-Year Network Improvement Plan is not required at this time.

3 In lieu of this requirement, Safari will fully comply with the requirements of 103-
4 690(C) and has submitted Safari's two-year Lifeline and Link Up advertising plan
5 in it's Application for Certification as an Eligible Telecommunications Carrier. As
6 Lifeline support is designed to reduce the monthly cost of telecommunications
7 services for eligible consumers, and is distributed on a per-customer basis and is
8 directly reflected in the price that the eligible customer pays, it is assured that all
9 support received by the carrier is used to provide Lifeline services to consumers,
10 thus promoting Lifeline and the availability of telephone service to low income
11 users, which is clearly in the public interest.

12
13 c. Providing service to its customers through resale of another carrier's
14 services or the use of switched port/loop combination UNEs, leased from the
15 ILECs, allows Safari to provide to its customers the same ability to remain
16 functional in emergency situations as currently provided by the ILECs to their
17 own customers (including access to a reasonable amount of back-up power to
18 ensure functionality without an external power source, rerouting of traffic around
19 damaged facilities, and the capability of managing traffic spikes resulting from
20 emergency situations). Further, by nature of the fact that these services are
21 implicitly included in the rates that Safari pays to the ILECs, these capabilities are
22 also available to Safari's customers.

23 d. Safari will satisfy applicable consumer protection and service quality

1 standards. Under FCC guidelines, an ETC Applicant must demonstrate that it will
2 satisfy applicable consumer protection and service quality standards. 47 CFR
3 §54.202(a)(3); FCC ETC Order at Para 28. Applicant will satisfy all such
4 standards. As part of its certification requirements for providing local exchange
5 services, Applicant must abide by the service quality and consumer protection
6 rules. In addition, Applicant commits to reporting information on consumer
7 complaints per 1,000 lines on an annual basis consistent with the FCC's ETC
8 Order. Applicant in general commits to satisfying all such applicable state and
9 federal requirements related to consumer protection and service quality standards.

10 e. Safari's offering includes a local usage component with unlimited local
11 calling similar to the ILECs' basic local service offerings. The amount of credits
12 that will be provided to eligible low participating in the lifeline and link-up
13 program, is set forth in proposed tariff revisions, which was attached as Exhibit 2
14 to our Application in this Docket.

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2 f. Safari acknowledges that the FCC may require it to provide equal access
3 to long-distance carriers in the event that no other eligible telecommunications
4 carrier is providing equal access within the service area.

5 g. As relevant to the Commission's public interest inquiry, Safari's presence
6 will undeniably include a benefit of increased customer choice, as Safari's service
7 offering is unique, and serves a specific sector of the public who might well not
8 otherwise have wire line telephone service.

9 h. Safari does not seek designation below the study area level of a rural
10 telephone company, and therefore, no "cream skimming" analysis is required.
11 Likewise, Safari does not seek designation as an ETC for any part of tribal lands.
12 Therefore, the public notice requirements established by the FCC for tribal lands
13 do not apply.

14 **Q: IN WHAT SERVICE AREAS IS SAFARI SEEKING DESIGNATION AS**
15 **AN ETC?**

16 **A:** Pursuant to Section 54.207 of the FCC's rules, a "service area" is a "geographic
17 area established by a state commission for the purpose of determining universal
18 service obligations and support mechanisms." 47 C.F.R. § 54.207(a). For service
19 areas served by non-rural ILECs such as BellSouth/AT&T, there are no
20 restrictions on how a Commission defines the "service area" for purposes of
21 designating a competitive ETC. Safari proposes a service area consisting of each
22 of the AT&T South Carolina wire centers in South Carolina which are set forth in
23 Exhibit 1 to our Application in this Docket.

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2 **Q: DOES SAFARI PROVIDE TELECOMMUNICATIONS SERVICE**
3 **THROUGHOUT THE NON-RURAL ILEC SERVICE AREAS FOR**
4 **WHICH IT SEEKS ETC DESIGNATION?**

5 **A:** Yes.

6 **Q: BEFORE DESIGNATING SAFARI AS AN ETC, IS THE COMMISSION**
7 **REQUIRED TO FIND THAT THE DESIGNATION IS IN THE PUBLIC**
8 **INTEREST?**

9 **A:** Yes.

10 **Q: HOW, AND IN WHAT TERMS, WILL SAFARI'S PRESENCE AS AN ETC**
11 **IN SOUTH CAROLINA AFFECT THE MARKET AS A WHOLE AND**
12 **THE PUBLIC INTEREST GENERALLY?**

13 **A:** A grant of Safari's application will serve the public interest and the market as a
14 whole by promoting additional deployment of Safari's unique local service. It is
15 important to note that most of Safari's customers do not meet the traditional
16 "creditworthiness" test of ILECs and CLECs, and therefore, many are unable to
17 obtain wire line local exchange service. Safari's designation as an ETC will bring
18 consumers the benefits of its unique service to a specific segment of the market.
19 Furthermore, A central purpose of the Telecommunications Act of 1996 was to
20 "promote competition and reduce regulation ... [thereby securing] lower prices
21 and higher quality services ... and encourage the rapid deployment of new
22 telecommunications technologies."¹ Designation of Safari as an ETC would

¹ The Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat.

1 further these goals. Granting ETC status to Safari would allow the Company to
2 obtain federal universal service support, which it will use to offer innovative
3 telecommunications services at competitive prices to non-rural consumers in the
4 Designated Service Area.

5 **Q: IF SAFARI'S PETITION IS GRANTED, WILL THERE BE ANY**
6 **FINANCIAL IMPACT ON THE UNIVERSAL SERVICE FUND OR THE**
7 **FEDERAL UNIVERSAL SERVICE FUND SURCHARGE THAT SOUTH**
8 **CAROLINA END USERS PAY?**

9 **A:** No. In fact the amount of support available to an eligible subscriber is exactly the
10 same whether the support is given through a company such as Safari or the
11 Incumbent LEC operating in the same service area. As such designation of Safari
12 will not create any financial impact on the Universal Service Fund, the Federal
13 Universal Surcharge that South Carolina end users pay, or an increase to the State
14 or its political subdivisions.

15
16 **Q: HAS SAFARI BEEN GRANTED ETC STATUS BY ANY STATE**
17 **COMMISSIONS?**

18 **A:** No, Safari has not been designated as ETC any other in the State.

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2 **Q: HAS SAFARI BEEN AUDITED BY USAC, OR ANY OTHER ENTITY,**
3 **PERTAINING TO LIFELINE AND LINK-UP?**

4 **A:** No.

5 **Q: DOES SAFARI AGREE TO COMPLY WITH ALL COMMISSION RULES**
6 **AND REGULATIONS REGARDING ETC, INCLUDING THOSE SET**
7 **FORTH IN DOCKET NO. 2006-37-C?**

8 **A:** Yes. Applicant hereby asserts its willingness and ability to comply with all the
9 rules and regulations that the Commission may lawfully impose upon Applicant's
10 provision of service contemplated by this application.
11 Applicant has requested ETC designation in wire centers located throughout, the
12 service area of AT&T South Carolina, a non-rural carrier. Additionally,
13 Applicant has limited its requested USF support to the federal USF low income
14 support program. Applicant certifies that all low income USF funding it receives
15 will be used to provide a credit to its Lifeline and Link-up eligible customers,
16 consistent with 47 CFR 54.403.

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Applicant agrees to include in its quarterly Service Quality Report the number and justification of applications held for more than 30 days and the number and justification of applications that were denied. Safari will only seek direct low income support from the Federal Universal Service Fund for the those line provided through the use of its own facilities or through a combination of its own facilities and the leased facilities of another carrier. Applicant agrees to utilize the same qualifying criteria for Lifeline and Link-up as is offered in the AT&T South Carolina territory (eligibility for TANF, Food Stamps, and Medicaid). Applicant agrees that it will abide by all advertising and reporting and verification requirements established by the FCC and Commission.

Q: EXPLAIN HOW THE COMPANY'S RATES AND CHARGES ARE COMPARABLE TO BELL SOUTH TELECOMMUNICATIONS/AT&T SOUTH CAROLINA RATES AND CHARGES?

A: Applicant agrees to provide Lifeline customers an additional \$3.50 credit in order that the federal matching monies can be maximized. This will yield a Lifeline credit of \$13.50 per month which is consistent with the credit offered throughout AT&T South Carolina service area.

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Q: DOES THIS CONCLUDE YOUR TESTIMONY?

15

A: Yes.

Exhibit A

Resume

Thomas Peltier
4915 Dorothy Avenue
Sarasota, Florida
34235
941-685-3111
SafariTom@aol.com

Objective

To own and operate a professional, successful Competitive Local Exchange Carrier.

Qualifications

Motivated, personable professional with a talent for quickly mastering technology useful to the average Competitive Local Exchange Carrier (CLEC), such as AT&T LENS programs, Quickbooks and Call Queue software.

Diplomatic and tactful with professionals and non-professionals at all levels.

Experienced in Accounting- maintaining accurate profit and loss, fiscal planning and budgeting funds per department based off previous budget and future projections.

Accustomed to handling sensitive, confidential records- demonstrated history of producing accurate, timely reports, meeting strict deadlines, and maintaining relationships across several vendors.

Flexible and versatile – able to maintain a tactful, calm environment under pressure.

Competent with demonstrated ability to easily transcend cultural differences.

Thrive in deadline-driven environments with excellent team-building skills.

Education

MANATEE TECHNICAL INSTITUTE

PARAMEDIC CERTIFICATION 2006

CENTRAL FLORIDA COMMUNITY COLLEGE – OCALA, FL
Associate of Arts Degree, 2001
GPA: 3.9/4.0

J.SERGEANT REYNOLDS COMMUNITY COLLEGE – RICHMOND, VA
GPA: 4.0/4.0 Law Enforcement Certification

DOUGLAS FREEMAN HS – OCALA, FL
High School Diploma, 1993
GPA: 3.85/3.9

Relevant Experience

THE BUTLER COMPANY, INC – Florida statewide Territory Manager, 1999 to 2004

Management of all aspects of operation to include: Facility rental/maintenance, employee scheduling for busy office averaging 50+ employees, finances related to accounts payable/receivable, invoicing, billing, budgeting.

Supervision of a total of six departments: Customer Service, Administration, Human Resources, Accounting, Marketing, and Compliance

Preparation of complex reports for company owners, showing profit and loss, company summaries, accounts gained and lost, meeting all requirements and tight deadlines.

HI-TECH COMMUNICATIONS– Ocala, FL. General Manager, 1996 to 2000

Assisted with launch of a thriving business, building substantial revenue in a 4 year period of time with minimal overhead.

Created special promotions, create bill inserts, market referrals- communicating with Billing Company and Marketing specialists.

Developed successful customer focused marketing campaigns exceeding the previous average of return and an increased customer base by 20%

Created Relationships with many vendors useful to the average cellular telephone/paging system provider.

Facilitated Time Tasks to track employee workload and adequately staff, ensured employee time clocks with accurate hours reported.

Timely handling of all Public Service Commission Complaints, Better Business Bureau Complaints.

Managed and delegated customer Call Queue to timely response to customer calls and reduced hold time.

Other Experience

Manatee County EMS
Paramedic